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# **United States Environmental Protection Agency** Region V POLLUTION REPORT

Date: Friday, January 06, 2006 Kevin Turner, OSC From:

Subject: Initial - #1

Clayton Chemical/RRG Soils Removal

#1 Mobile Avenue, Sauget, IL

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Latitude: 38.8303 Longitude: -90.1825

POLREP No.:

Site #:

Reporting Period:

D.O. #: **Response Authority:** 

**CERCLA** 

Start Date: Mob Date:

12/5/2005 **Response Type:** 

Non-Time-Critical

**Completion Date:** 

**NPL Status: Incident Category:**  Non NPL Removal Action

CERCLIS ID #: RCRIS ID #:

Contract #

## Site Description

Time critical soil removal from industrial property related to a former oil and solvent recycling/waste brokerage operation.

#### 1. Location

The Site is located at #1 Mobile Avenue in Sauget, IL, St. Clair County, Illinois. The 7-acre parcel is located in a heavy industrial area and lies in a flood plain just to the east of the Mississippi River.

#### 2. Description of threat

Past operating practices are believed to have contributed to land disposal of paint wastes, paint waste solids, solvents and perhaps other unknown regulated waste materials.

## 3. Site background

Prior to 1961, the site was occupied and operated by GM & O Railroad as a railroad maintenance facility and railroad related equipment storage complex and rail siding.

From 1961 to 1998, the primary site operations involved the recovery/recycling of waste oils and waste solvents under a succession of different operating entities. Thee time frames and operating entities were:

- Clayton Chemical Corporation (1961 1980, and 1983 1996)
- Trade Waste Incineration (1980 1983)
- Resource Recovery Group (1996 1998)

Resource Recovery Group (RRG) shut down its primary waste receipt/brokering activities on August 27, 1998, as directed by court order. Several above ground storage tanks contained liquid and sludge waste materials and the drum handling building also contained drummed waste materials at the time site operations were suspended.

#### 4. State and local actions to date

As specified by the August 27, 1998 court order, RRG management failed to provide proof of financial assurance which further stipulated that the facility could not receive inbound shipments of any waste materials after that date. The court order did allow for outbound waste shipments only.

For a period of time until recently, the site remained inactive with remnant waste materials contained in a variety of tanks and also in drums located in the former waste drum handling building.

In early June, 2001, U. S. EPA secured site access and conducted a site assessment to evaluate any potential site releases from historic site operations. Several soil, groundwater and containerized waste samples were collected and analyzed. The site assessment revealed impacts to on-site soils and a large volume of liquid hazardous and non-hazardous RCRA waste within tanks, drums and other containers.

On October 8, 2002, U. S. EPA issued a CERCLA Section 106 Administrative Order of Consent (AOC) for the removal of liquid hazardous substances (LHS) stored at the Site. A private responsible party (PRP) Liquids Removal Group was created to facilitate only the removal of liquid wastes at that time. The removal of liquids did not include the removal of tank bottoms including the various sludge/solids. It is currently estimated that there are over 40,000 gallons of sludge/solids in several tanks and drum containers.

The PRP Liquids Removal Group also researched all available Site records and Illinois EPA documents to develop the August 2004, PRP Waste Report. The Waste Report and Weston site assessment was ultimately used to develop the current approach to remove all remnant containerized waste solids; decommission all above ground storage tanks and related structures; and remove impacted surface soils from suspected past site operations.

## **Current Activities**

1. Response activities to date

☐ After a series of meetings with the PRP representatives and their oversight contractor, Conestoga-Rovers & Associates, Inc. (CRA), U. S. EPA requested that a Work Plan be submitted for project related removal activities. The PRP's executed the Settlement Agreement in early October, 2005. U. S. EPA received the revised project Work Plan in early October, 2005. The Administrative Order on Consent (AOC) was executed between the respondents and U. S. EPA on October 27, 2005.

☐ On November 16, 2005, CRA notified U. S. EPA that a removal contractor, Brandenburg

On November 16, 2005, CRA notified U. S. EPA that a removal contractor, Brandenburg Industrial Services (Brandenburg), was selected to perform tank decommissioning and soil removal activities. On December 5, 2005, the removal contractor initiated mobilization of heavy equipment resources to the site.

15 cubic yards of asbestos containing materials were removed during the weeks of December 5th and 12th, 2005.

☐ A chemical sweep was performed on December 5th and 6th, 2005.
☐ Brandenburg initiated demolition of empty above ground storage tanks on December 6, 2005.
During the week of December 12, 2005, CRA/Brandenburg site representatives collected representative waste samples for disposal characterization at an EQ Treatment Storage Disposal Facility (TSDF). Results are expected in early January of 2006.
Planned Removal Actions  ☐ Decommissioning and scrap metal disposal of empty above ground storage tanks will continue as directed by the OSC.
☐ Empty 55-gallon drums containers stored inside the drum processing building will be crushed and sent for off-site metal recycling starting in January, 2006.
☐ Waste sludge and solids contained in tanks and drums, and, impacted soil removal activities are expected to commence during the first quarter of 2006.
Next Steps  Decommissioning and scrap metal disposal of empty above ground storage tanks will continue as directed by the OSC.
☐ Empty 55-gallon drums containers stored inside the drum processing building will be crushed and sent for off-site metal recycling starting in January, 2006.
☐ Waste sludge and solids contained in tanks and drums, and, impacted soil removal activities are expected to commence during the first quarter of 2006.
Key Issues None
www.epaosc.net/ClaytonChemical-RRGSoilsRemoval